

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

Priya Saxena,)	
)	
Plaintiff,)	
)	
v.)	Civ. 25-5035
)	
Kristi Noem, in her official capacity as	(
Secretary of Homeland Security;)	
the Department of Homeland Security;)	
and Todd Lyons, in his official capacity)	
as Acting Director of U.S. Immigration)	
and Customs Enforcement,)	
)	
Defendants.)	
_____)	

Declaration of James D. Leach

1. Attached as Exhibit 1 is a true copy of the notarized Affidavit of Jasmin Farmakes, Ph.D., stating the results of two blood tests for ethyl alcohol content for Priya Saxena as 0.0612% and 0.0611%.

2. Attached as Exhibit 2 is a true copy of U. S. Department of State Guidance Directive 2016-03, 9 FAM [Foreign Affairs Manual] 403.11-3, which I printed from the internet on May 3, 2025.

3. Attached as Exhibit 3 is a true copy of Ms. Hofmann email to me on May 7, 2025, and my response.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 9, 2025.

/s/ James D. Leach

James D. Leach